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07 JUL -2 AM 10:04  
RICHARD H. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

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Attorneys for Plaintiff  
NORCA INDUSTRIAL, LLC

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

NORCA INDUSTRIAL, LLC, a New York  
Limited Liability Company,

Plaintiff,

v.

ROBERT WREN, an individual; PRIMROSE  
METALS, INC., a California corporation;  
RICHARD RAYBIN, an individual; LIFETIME  
CAPITAL GROUP, an unknown entity;  
VICTORIA PICLOTTI, an individual;

Defendants.

CASE NO. C 07 3425 EDL

**SUPPLEMENTAL  
DECLARATION OF COUNSEL  
IN SUPPORT OF PLAINTIFF'S  
EX PARTE APPLICATION FOR  
TEMPORARY RESTRAINING  
ORDER, PRELIMINARY  
INJUNCTION AND EXPEDITED  
DISCOVERY**

Date: July 2, 2007

Time: 10:00 a.m.

Room: Clerk's Office, 16th Flr.

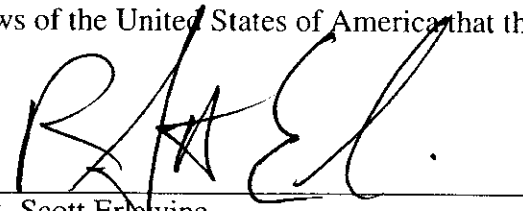
R. SCOTT ERLEWINE declares:

1. I am a member of Phillips, Erlewine & Given LLP, counsel for defendant Norca Industrial LLC (hereafter "Norca") in this action. The facts set forth in this declaration are based upon my personal knowledge, except where stated to be on information and belief, and as to those, I believe it to be true.

1           2.       Attached hereto as Exhibit A is a true and correct copy of an e-mail I received on  
2       June 30, 2007 from John Cha, Esq., who I understand represents Robert Wren.

3           I declare under penalty of perjury under the laws of the United States of America that the  
4       foregoing is true and correct.

5       Executed on: ~~June~~ <sup>July 2,</sup> \_\_, 2007

  
R. Scott Erlewine

## Randy Erlewine

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**From:** John Cha [JCha@srclaw.com]  
**Sent:** Saturday, June 30, 2007 10:30 AM  
**To:** rse@phillaw.com  
**Cc:** Brent Finch  
**Subject:** Norca v. Bob Wren, et al.

Randy:

Thank you for e-mailing the declarations and supporting documents last evening. Let me know when the remaining paperwork is completed.

Question: can you please dismiss Victoria Picolotti? She, as you know, is/was Bob's secretary. She will, of course, be made available to you upon request, formal or informal, but I doubt you need her as a named-defendant. Let me know.

Information: Richard Raybin – I don't believe he was properly served with process because your process server just dropped off the documents with Bob Wren. Raybin and Wren no longer have a relationship. Further, Primrose Metals, Inc., is no longer affiliated with Bob Wren. Rather, we incorporated Primrose Alloys, Inc., and it is that new entity for which Bob Wren is the President. Primrose Metals, Inc., was incorporated by Rick Raybin. Based on your declaration, I believe Lifetime Capital Group is a Raybin-controlled entity of which an affiliation with Bob Wren does not exist.

Thanks.

John S. Cha  
**STONE | ROSENBLATT | CHA**  
21550 Oxnard St. | Main Plaza | Ste. 200  
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7/2/2007